

# **EXHIBIT 17**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 1:18-CV-25106-KMW

UNITED AMERICAN CORP.,

Plaintiff,

v.

BITMAIN INC., SAINT BITTS LLC d/b/a  
BITCOIN.COM, ROGER VER, BITMAIN  
TECHNOLOGIES LTD., BITMAIN  
TECHNOLOGIES HOLDING COMPANY,  
JIHAN WU, PAYWARD VENTURES, INC.  
d/b/a KRAKEN, JESSE POWELL,  
AMAURY SECHET, SHAMMAH  
CHANCELLOR, and JASON COX,

Defendants.

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**DECLARATION OF LUYAO LIU**

I, Luyao Liu, declare:

1. I am the Chief Financial Officer of Defendant BitMain Technologies Holding Company ("BTH"). I am over the age of 18 and make this declaration of my own personal knowledge, and, if called as a witness, I would testify competently to the facts stated herein.
2. BTH is organized under the laws of the Cayman Islands and is headquartered in the People's Republic of China.
3. BTH is a holding company that is the parent entity of separate, legally distinct entities.
4. BTH and its subsidiaries observe the required corporate formalities and maintain their own books and records.
5. BTH does not control the day-to-day operations of its subsidiaries.

6. BTH has never transacted any business in Florida or the United States.
7. BTH has never been authorized to do business in Florida or in any other State within the United States.
8. BTH has never had any employees, offices or property in Florida or the United States.
9. BTH has never paid taxes to Florida or any other State within the United States.
10. BTH does not design or manufacture the Application Specific Integrated Circuit (“ASIC”) devices referred to in the Complaint.
11. BTH does not own or operate the Antpool and BTC.com mining pools referred to in the Complaint.
12. BTH does not make day-to-day operational decisions about how to deploy the pools of cryptocurrency mining servers referred to in the Complaint.
13. The Court’s exercise of jurisdiction over BTH would pose a substantial burden in that it would be required to retain Florida attorneys and its employees would be required to travel to Florida from the People’s Republic of China to defend against this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of October 2019, in Beijing.

By:



Luyao Liu